



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nestlé Waters North America Holdings, Inc.
Kim E. Jeffrey, President and CEO
900 Long Ridge Road, Building 2
Stamford, CT 06902-1138

FEB 14 2013

**Re: Required Submission of Information
Lower Darby Creek Area Superfund Site,
Operable Unit 1 - Clearview Landfill
Darby Township, Delaware County and Philadelphia, Pennsylvania**

Dear Mr. Jeffrey:

The U.S. Environmental Protection Agency ("EPA") is seeking information related to the release, or threat of release, of hazardous substances, pollutants or contaminants into the environment from Operable Unit 1 of the Lower Darby Creek Site ("Site"). EPA is investigating the source of contamination in the vicinity of the Clearview Landfill, also known as Heller's Dump (collectively, "Clearview"), located at or near 83rd Street and Buist Avenue in Philadelphia, PA and bordering Darby Creek in Darby Township. The Site also includes the Folcroft Landfill and Annex located approximately two miles away in Folcroft Borough, Delaware County. This information request is limited to Clearview. A former employee of Edward Lawrenson, Inc. interviewed in connection with the Site recalled transporting waste from "Great Bear Water Company" in Philadelphia and disposing of such waste at Clearview (see Enclosure F). EPA believes "Great Bear Water Company" was owned by Nestlé Waters North America Holdings, Inc. or a subsidiary. The specific information required is attached to this letter as Enclosure E.

Pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9604(e), EPA has the authority to require Nestlé Waters North America Holdings, Inc. ("Nestlé" or "you") to furnish all information and documents in its possession, custody, or control, or in the possession, custody, or control of any of its employees or agents, which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), pollutants and/or contaminants as defined by Section 101(33) of CERCLA, 42 U.S.C. § 9601(33), which were transported to, stored, treated, or disposed of at the above-referenced Site.

Please respond in writing to this required submission of information within **thirty (30) calendar days** of your receipt of this letter.

If, for any reason, Nestlé does not provide all information responsive to this letter, then in its answer to EPA Nestlé should: (1) describe specifically what was not provided, and (2) provide to EPA an appropriate reason why the information was not provided.

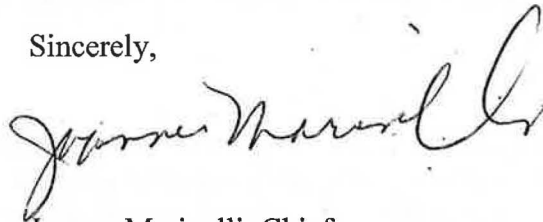
All documents and information should be sent to:

Ms. Maria Goodine (3HS62)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

If you have any questions concerning this matter, please contact Compliance Officer Maria Goodine at (215) 814-2488, or have your attorney contact Senior Assistant Regional Counsel Bonnie A. Pugh at (215) 814-2680.

Sincerely,

A handwritten signature in dark ink, appearing to read "Joanne Marinelli", is written over a light background.

Joanne Marinelli, Chief
Cost Recovery Branch

- Enclosures: A. Business Confidentiality Claims/Disclosure of Your Response to
EPA Contractors and Grantees
B. List of Contractors that May Review Your Response
C. Definitions
D. Instructions
E. Information Requested
F. Interview Summary

cc: Bonnie A. Pugh (3RC43)
Maria Goodine (3HS62)
Joshua Barber (3HS21)
Noreen Wagner (PADEP)

Enclosure A

Business Confidentiality Claims

You are entitled to assert a claim of business confidentiality covering any part or all of the submitted information, in the manner described in 40 C.F.R. Part 2, Subpart B. Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted when the information is submitted to EPA, EPA may make this information available to the public without further notice to you. You must clearly mark such claimed information by either stamping or using any other such form of notice that such information is a trade secret, proprietary, or company confidential. To best ensure that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.

Disclosure of Your Response to EPA Contractors and Grantees

EPA may contract with one or more independent contracting firms (See, Enclosure B) to review the documentation, including documents which you claim are confidential business information ("CBI"), which you submit in response to this information request, depending on available agency resources. Additionally, EPA may provide access to this information to (an) individual(s) working under (a) cooperative agreement(s) under the Senior Environmental Employee Program ("SEE Enrollees"). The SEE Program was authorized by the Environmental Programs Assistance Act of 1984 (Pub. L. 98-313). The contractor(s) and/or SEE Enrollee(s) will be filing, organizing, analyzing and/or summarizing the information for EPA personnel. The contractors have signed a contract with EPA that contains a confidentiality clause with respect to CBI that they handle for EPA. The SEE Enrollee(s) is working under a cooperative agreement that contains a provision concerning the treatment and safeguarding of CBI. The individual SEE Enrollee has also signed a confidentiality agreement regarding treatment of CBI. Pursuant to Section 104(e)(7) of CERCLA, 42 U.S.C. § 9604(e)(7), and EPA's regulations at 40 C.F.R. § 2.310(h), EPA may share such CBI with EPA's authorized representatives which include contractors and cooperators under the Environmental Programs Assistance Act of 1984. (See 58 Fed.Reg. 7187 (1993)). If you have any objection to disclosure by EPA of documents which you claim are CBI to any or all of the entities listed in Enclosure B, you must notify EPA in writing at the time you submit such documents.

Enclosure B

[rev. 10/2012]

List of Contractors That May Review Your Response

Emergint Technologies, Inc.

Contract # EP-W-11-025

Subcontractor: Booz-Allen & Hamilton

Booz-Allen & Hamilton

Contract # GS-35F-0306J (GSA Schedule)

CDM-Federal Programs Corporation

Contract # EP-S3-07-06

Subcontractors: L. Robert Kimball & Associates Inc.
Avatar Environmental LLC
Terradon Corporation

Chenega Global Services, LLC

Contract #EP-S3-09-02

EA Engineering, Science and Technology, Inc.

Contract #EP-S3-07-07

Subcontractor: URS

Eisenstein Malanchuck, LLP

Contract #EP-W-07-079

Subcontractors: R. M. Fields International, LLC
James C. Hermann & Associated

Hydrogeologic (HGL)

Contract #EP-S3-07-05

Subcontractor: CH2MHill
Sullivan International

Weston Solutions

Contract #EP-S3-1005

Tech Law, Inc.

Contract #EP-S3-1004

Tetra Tech NUS, Inc.

Contract #EP-S3-07-04

Kemron Environmental Services, Inc.

Contract #EP-S3-12-01,

Subcontractor: AECOM Technical Services, Inc.

Guardian Environmental Services Company, Inc.

Contract #EP-S3-12-02,

Subcontractors: Aerotek, Inc.,
Tetra Tech, Inc.

Environmental Restoration, LLC

Contract # EP-S3-12-03

Subcontractors: Aerotek, Inc
Haas Environmental, Inc,
Hertz

WRS Infrastructure & Environment, Inc.

Contract # EP-S3-12-05

Industrial Economics, Inc.

Contract # EP-W-06-092

Cooperative Agreements

National Association of Hispanic Elderly

CA# Q83424401

CA # ARRA 2Q8343730-01

National Older Workers Career Center

CA# Q-835030

Enclosure C

Definitions

1. The term "arrangement" shall mean every separate contract or other agreement or understanding between two or more persons, whether written or oral.
2. The term "documents" shall mean writings, photographs, sound or magnetic records, drawings, or other similar things by which information has been preserved and also includes information preserved in a form which must be translated or deciphered by machine in order to be intelligible to humans. Examples of documents include, but are not limited to, electronic mail and other forms of computer communication, drafts, correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, summaries, pamphlets, books, invoices, checks, bills of lading, weight receipts, toll receipts, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, inter-office and intra-office communications, notations of any conversations (including, without limitation, telephone calls, meetings, and other communications such as e-mail), bulletins, printed matter, computer printouts, invoices, worksheets, graphic or oral records or representations of any kind (including, without limitation, charts, graphs, microfiche, microfilm, videotapes, recordings and motion pictures), electronic, mechanical, magnetic or electric records or representations of any kind (including, without limitation, tapes, cassettes, discs, recordings and computer memories), minutes of meetings, memoranda, notes, calendar or daily entries, agendas, notices, announcements, maps, manuals, brochures, reports of scientific study or investigation, schedules, price lists, data, sample analyses, and laboratory reports.
3. The term "hazardous substance" means (a) any substance designated pursuant to section 1321(b)(2)(A) of Title 33 of the U.S. Code, (b) any element, compound, mixture, solution, or substance designated pursuant to Section 9602 of CERCLA, (c) any hazardous waste having the characteristics identified under or listed pursuant to Section 3001 of the Solid Waste Disposal Act (42 U.S.C. § 6921) (but not including any waste the regulation of which under the Solid Waste Disposal Act, 42 U.S.C. § 6901 *et seq.*, has been suspended by Act of Congress), (d) any toxic pollutant listed under Section 1317(a) of Title 33, (e) any hazardous air pollutant listed under section 112 of the Clean Air Act, 42 U.S.C. § 7412, and (f) any imminently hazardous chemical substance or mixture with respect to which the Administrator has taken action pursuant to Section 2606 of Title 15 of the U.S. Code. The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under subparagraphs (a) through (f) of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

4. The term "pollutant or contaminant" shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations in such organisms or their offspring, except that the term "pollutant or contaminant" shall not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under CERCLA, and shall not include natural gas, liquefied natural gas, or synthetic gas of pipeline quality (or mixtures of natural gas and such synthetic gas).
5. The term "release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant), but excludes (a) any release which results in exposure to persons solely within a workplace, with respect to a claim which such persons may assert against the employer of such persons, (b) emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel, or pipeline pumping station engine, (c) release of source, byproduct, or special nuclear material from a nuclear incident, as those terms are defined in the Atomic Energy Act of 1954, 42 U.S.C. § 2011 et seq., if such release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under Section 170 of such Act, 42 U.S.C. § 2210, or, for the purposes of Section 9604 of CERCLA or any other response action, any release of source, byproduct, or special nuclear material from any processing site designated under 42 U.S.C. §§ 7912(a)(1) and 7942(a) and (d) the normal application of fertilizer.
6. The term "waste" or "wastes" shall mean and include any discarded materials including, but not limited to, trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, pollutants or contaminants, and discarded or spilled chemicals, whether solid, liquid, or sludge.
7. The term "you" when referring to an incorporated entity shall mean and include the incorporated entity and its agents and representatives, including, but not limited to, persons directly authorized to transact business on the entity's behalf such as officers, directors, or partners with which the entity is affiliated, employees, accountants, engineers, or other persons who conduct business on the entity's behalf, as well as affiliated entities, including, but not limited to, partnerships, limited liability companies, divisions, subsidiaries, and holding companies.

Enclosure D

Instructions

1. You are entitled to assert a claim of business confidentiality covering any part or all of the information you submit. If you desire to assert a claim of business confidentiality, please see Enclosure A, *Business Confidentiality Claims/Disclosure of Your Response to EPA Contractors and Grantees*. You must clearly mark such information by either stamping or using any other form of notice that such information is a trade secret, proprietary, or company confidential. To ensure to the greatest extent that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.
2. Please provide a separate, detailed narrative response to each question, and to each subpart of each question, set forth in this Information Request. If you fail to provide a detailed response, EPA may deem your response to be insufficient and thus a failure to comply with this Information Request, which may subject you to penalties.
3. Precede each response with the number of the question or subpart of the question to which it corresponds. For each document or group of documents produced in response to this Information Request, indicate the number of the specific question or subpart of the question to which the document(s) responds.
4. Should you find at any time after submission of your response that any portion of the submitted information is false, misrepresents the truth or is incomplete, you must notify EPA of this fact and provide EPA with a corrected written response.
5. Any terms that are used in this Information Request and/or its Enclosures that are defined in CERCLA shall have the meaning set forth in CERCLA. Definitions of several such terms are set forth in Enclosure C, *Definitions*, for your convenience. Also, several additional terms not defined in CERCLA are defined in Enclosure C. Those terms shall have the meaning set forth in Enclosure C any time such terms are used in this Information Request and/or its Enclosures.

Enclosure E

Information Required

In the following questions, the terms "Nestlé," "you" and "your" refer to Nestlé Waters North America Holdings, Inc. The term "Great Bear" refers to "Great Bear" refers collectively to Great Bear Spring Water and any Nestlé company which bottled it. The term "Philadelphia area" refers to southeastern Pennsylvania and southern New Jersey.

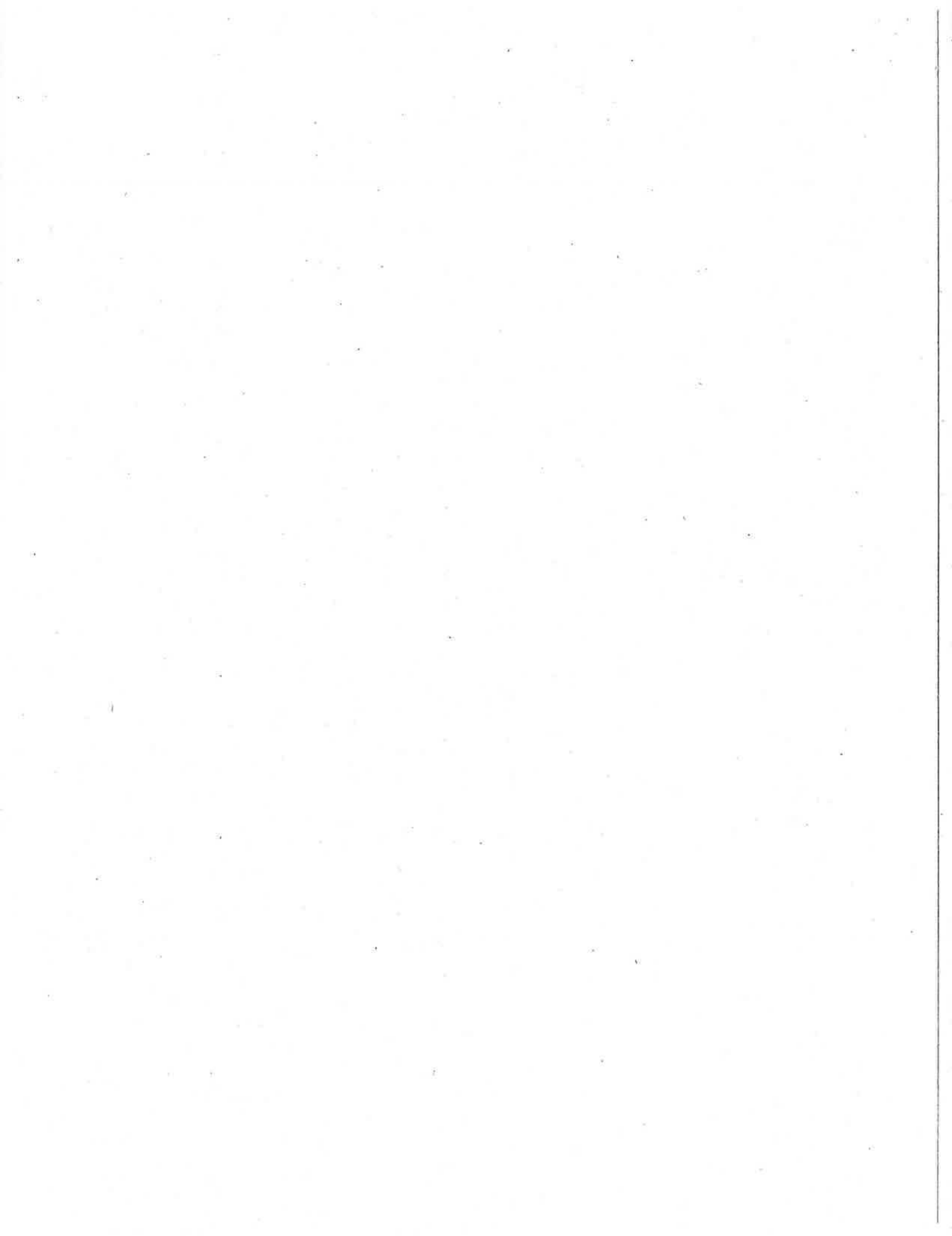
1. Describe Nestlé's corporate history in detail. Your answer should include specific information on any mergers and acquisitions, name changes, asset purchases/sales etc. involving Nestlé and Great Bear and include complete copies of all relevant documents.
2. What was the nature of Nestlé's business or activity in the Philadelphia area, including, but not limited to the manufacture/bottling of Great Bear, between 1958 and 1976? Please describe in detail.
3. Identify all persons currently or formerly employed by Nestlé or any subsidiary who have or may have personal knowledge of the operations and waste disposal practices of Great Bear between 1958 and 1976. For each such person, state that person's job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.
4. Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at Great Bear between 1958 and 1976. With respect to each such hazardous substance, further identify:
 - a. The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled at Great Bear's Philadelphia area facility;
 - b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance;
 - c. The annual quantity of each such hazardous substance used, generated, purchased, stored, or otherwise handled at Great Bear's Philadelphia area facility;
 - d. The beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled at Great Bear's Philadelphia area facility;
 - e. The types and sizes of containers in which these substances were transported and stored; and
 - f. The persons or companies that supplied each such hazardous substance Great Bear.

5. Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled at Great Bear's Philadelphia area facility between 1958 and 1976. With respect to each such by-product and waste identified, further identify:
 - a. The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled at Great Bear's Philadelphia area facility;
 - b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste;
 - c. The annual quantity of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled at Great Bear's Philadelphia area facility;
 - d. The types, sizes and numbers of containers used to treat, store, or dispose each such by-product or waste;
 - e. The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and
 - f. The location and method of treatment and/or disposal of each such by-product or waste.
6. Did Great Bear ever contract with, or make arrangement with any of the following companies: Clearview Land Development Company, the Clearview Landfill, Heller's Dump, Richard or Edward Heller, Eastern Industrial Corporation, Tri-County Hauling, Patrick Bizzari Hauling, "Charles Crumbley," Ace Service Corp./Ace Dump Truck, Edward Lawrenson, Inc., "Quickway," "Nu Way," "Bennie's Hauling," William Adams and Sons, "Al Gonnelli," Schiavo Brothers, Inc., "Maritime," Dorner Trash, Harway, Inc./Warren Harmon, Inc., Northeast Disposal, Donald Vile, Inc., Disposal Corporation of America, "White Glove Trash" or any other company or municipality to remove or transport material from Great Bear's facility in the Philadelphia, Pennsylvania area for disposal between 1958 and 1976? If so, for each transaction identified above, please identify:
 - a. The person with whom Great Bear made such a contract or arrangement;
 - b. The date(s) on which or time period during which such material was removed or transported for disposal;
 - c. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
 - d. The annual quantity (number of loads, gallons, drums) of such material;
 - e. The manner in which such material was containerized for shipment or disposal;
 - f. The location to which such material was transported for disposal;

- g. The person(s) who selected the location to which such material was transported for disposal;
 - h. The individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom Great Bear dealt concerning removal or transportation of such material; and
 - i. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your possession regarding arrangements made to remove or transport such material.
- 7. Identify individuals employed by Great Bear who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for payments, payment approvals, and record keeping concerning such waste removal transactions at Great Bear's Philadelphia, Pennsylvania area facility between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same person identified by your answer to Question 3, so indicate.
- 8. For every instance in which Great Bear disposed of or treated material at Clearview or other areas of the Site, or arranged for the disposal or treatment of material at the Site, identify;
 - a. The date(s) on which such material was disposed of or treated at the Site;
 - b. The nature of such material, including the chemical content, characteristics, and physical state (i.e. liquid, solid or gas);
 - c. The annual quantity (number of loads, gallons, drums) of such material;
 - d. The specific location on the Site where such material was disposed of or treated; and
 - e. Any billing information and documents (invoices, trip tickets, manifests, etc.) in Nestlé's possession regarding arrangements made to dispose of or treat such material at the Site.
- 9. Did Great Bear, or any other company or individual, ever spill or cause a release of any chemical, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste at Clearview? If so, identify the following:
 - a. The date(s) the spill(s)/release occurred;
 - b. The composition (i.e., chemical analysis) of the materials which were spilled/released;
 - c. The response made by Great Bear or on its behalf with respect to the spill(s)/release(s); and

- d. The packaging, transportation, final disposition of the materials which were spilled/released.
10. Did Great Bear or any person or entity on its behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview? If so, please provide all documents pertaining to such assessments or investigations.
 11. If you have any information about other parties who may have information which may assist the EPA in its investigation of Clearview, or who may be responsible for the generation of, transportation of, or release of contamination at Clearview, please provide such information. The information you provide in response to this request should include the party's name, address, telephone number, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.
 12. Identify the person(s) answering these questions on your behalf, including full name, mailing address, business telephone number, and relationship to the company.
 13. Provide the name, title, current address, and telephone number of the individual representing Nestlé to whom future correspondence or telephone calls should be directed.
 14. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:
 - a. Your document retention policy;
 - b. A description of how the records were/are destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;
 - c. A description of the type of information that would have been contained in the documents; and
 - d. The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Enclosure F
Interview Summary





SDMS DocID

2063824

INTERVIEW SUMMARY
Task Order 0001 Site 2
Lower Darby Creek Area

Joshua Turner

Prepared for:

U.S. Environmental Protection Agency
Region 3
Enforcement Support Services
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103

Prepared by:

Chenega Integrated Systems, LLC
4651 Salisbury Road
Quadrant 1, Suite 251
Jacksonville, FL 32256

Work Assignment Number:
Date Submitted:
Contract Number:
EPA Work Assignment Manager:
Telephone Number:
Chenega Project Manager:
Telephone Number:
Interviewer:

Task Order 0001 Site 2
December 21, 2005
EP-S3-04-01
Carlyn Winter-Prisk
(215) 814-2625
Ilona Poppke
(215) 491-7286
Michael McCloskey
Tri-State Enterprise

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Interview Summary
Joshua Turner

December 21, 2005
Page 2

Name: Joshua Turner ("WITNESS")
[REDACTED]
Affiliation: Former Trash Truck Driver for Ed Lawrenson, Inc.
Telephone: [REDACTED]
Type of Interview: In-Person
Date of Interview: December 20, 2005

On December 20, 2005, the WITNESS was interviewed in the parking lot of the Wawa store located on Route 322 in Glassboro, New Jersey by Michael McCloskey, Senior Investigator, of Tri-State Enterprise. The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001 Site 2 for the Lower Darby Creek Area Site in Delaware County, Pennsylvania (the "Site.") This interview focused on the Clearview Landfill (the "Landfill.") The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this manner and did not want an attorney present. No other persons were present, and this interview was not tape-recorded.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS was shown an aerial photograph of the Site. This aerial photograph was used as a reference throughout the interview. The aerial photograph used during this interview will be forwarded under separate cover.

The WITNESS was asked to explain his association with Ed Lawrenson, Inc. (ELI) and his association with the Clearview Landfill.

The WITNESS stated that he was employed by ELI from 1965 to approximately 1992 as a trash truck driver. The WITNESS stated that he drove a 20-cubic yard compactor truck for most of the time he worked for ELI.

The WITNESS stated that ELI was owned by Edward Lawrenson and operated approximately nine compactor trash trucks and two roll-off trucks.

When asked if he ever disposed of waste at the Clearview Landfill during the time he was employed by ELI, the WITNESS stated "yes." The WITNESS stated that he disposed of waste at the Landfill approximately five times each week from 1965 until 1975, when the

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Landfill closed. The WITNESS stated that all of the ELI trucks disposed of waste at the Landfill. The WITNESS stated that he also knew the Landfill by the name "Heller's Dump."

When asked to identify the locations from which the WITNESS picked up waste and disposed of waste at the Clearview Landfill, the WITNESS provided the following:

- Thomas Court Shoe Factory: The WITNESS stated that this factory is located in the area of 19th and Allegheny Streets in Philadelphia. The WITNESS stated that he picked up waste from this location daily. He described the waste as rubber and shoe scraps. When asked if the waste contained glue, the WITNESS stated that he did not know.
- Cutler Sign Company: The WITNESS stated that this company is located at 22nd and Diamond Streets in Philadelphia. The WITNESS stated that he picked up waste at this location daily. He described the waste as scraps of plastic, broken glass, and paper.
- William Sicheck Clothing Manufacturer (correct spelling unknown): The WITNESS stated that this plant was located in the area of 19th and Allegheny Streets in Philadelphia.
- MAB Paint Stores: The WITNESS stated that MAB Paint operated numerous retail stores under the name MAB Paints. The WITNESS stated that he picked up waste from several of these stores. He was only able to recall the location of one MAB store located on Germantown Avenue in Philadelphia. The WITNESS described the waste as paper and cardboard. When asked if he ever picked up paint cans from these locations, the WITNESS stated that he does not know.
- Great Bear Water Company: The WITNESS stated that this company is located at 17th and Rockledge Streets in Philadelphia. The WITNESS stated that he could not recall the type of waste picked up from this location or the frequency of pick-ups. The WITNESS stated that ELI maintained a 40-cubic yard container at this location. The WITNESS stated that he did not operate the roll-off truck and did not know what type of waste was disposed in the roll-off container.
- St. Luke's Hospital: The WITNESS stated that the hospital is located at 9th and Girard Streets in Philadelphia. The WITNESS stated that he cannot recall the types of waste picked up from this location.
- University of Pennsylvania Pharmaceutical College: The WITNESS stated that the college was located at 46th Street and Woodland Avenue. The WITNESS stated that he picked up waste from this location on a daily basis. The WITNESS could not recall the types of waste.
- Quaker Salads: The WITNESS stated that this company was located on Old York Road and he described the waste as food scraps.

- Le Bec Fin: The WITNESS stated that he picked up waste at this location daily. The WITNESS described the waste as food scraps.

The WITNESS stated that he picked up waste from many of the restaurants in center city Philadelphia that were located between 15th and 18th Streets. The WITNESS stated that he could not recall any additional specific names.

The WITNESS stated that ELI picked up waste from all of the restaurants in Chinatown in center city Philadelphia. The WITNESS stated that he was a relief driver for the Chinatown route. He was unable to recall the names of any of the restaurants.

When asked if ELI was purchased by Eastern Industrial, the WITNESS stated "yes." The WITNESS stated that in approximately 1992, Eastern Waste Inc., which he believes was Eastern Industrial, purchased ELI. The WITNESS stated that this purchase included all of the equipment and customers owned by ELI. The WITNESS stated that he continued to work for Eastern Waste, Inc., until Eastern Waste Inc. was purchased by Atwood's. The WITNESS stated that this purchase occurred approximately six months after the Eastern Waste Inc. purchase of ELI.

The WITNESS stated that the general manager of Eastern Waste, Inc. was John Moore. The WITNESS stated that Al Hawthorn was also one of the senior managers. The WITNESS stated that the owners of the Kinsley Landfill in New Jersey were the owners of Eastern Waste, Inc., and John Moore worked for them. He did not know the names of the owners of the Landfill.

When asked the names of other waste transporters that he observed disposing of waste on the Clearview Landfill, the WITNESS provided the following:

- 20th Century Hauling: The WITNESS stated that this company owned and operated numerous roll-off containers. He did not know the names of any of the customers of this company.
- Bizzari Hauling.
- Darby Township.
- Ed Kenneally.
- Charles Crumly: The WITNESS stated that Crumly is still in business and operates at 24th and Sedgley Streets.
- City-Wide Services.
- Schiavo Brothers.
- John Price Trash.
- Ace Trash.
- Hawthorn Trash.

The WITNESS stated that there were numerous other haulers who disposed of waste at the Clearview Landfill, but he could not recall any more specific names.

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Interview Summary
Joshua Turner

December 21, 2005
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When asked the names of other ELI drivers who disposed of waste at Clearview Landfill, the WITNESS provided the following:

- Johnny Williams.
- Tommy Hollywood.

When asked the names of employees of the Clearview Landfill, the WITNESS provided the following:

- Jimmy McGuire: The WITNESS stated that McGuire was the bulldozer operator.
- Ed Wright: The WITNESS stated that Wright worked at the entrance to the Clearview Landfill taking tickets from the drivers. The WITNESS stated that Wright also owned and operated a box truck that he used to dispose of waste at the Landfill. The WITNESS did not know what types of waste Wright transported to the Landfill.

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____
(Date)

Signed _____
(Name)

